

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth and ERS.

ORDER GRANTING THREE HUNDRED SEVENTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO SATISFIED CLAIMS

Upon the *Three Hundred Seventeenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Satisfied Claims* [ECF No. 16640] (the “Three Hundred Seventeenth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Seventeenth Omnibus Objection.

(“Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), dated April 30, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or ERS, as more fully set forth in the Three Hundred Seventeenth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Seventeenth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Seventeenth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Three Hundred Seventeenth Omnibus Objection (collectively, the “Satisfied Claims”) having been found to be fully satisfied; and the Court having determined that the relief sought in the Three Hundred Seventeenth Omnibus Objection is in the best interests of the Commonwealth, ERS, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Seventeenth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Seventeenth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Seventeenth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Satisfied Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Satisfied Claims as expunged in the official claims registry in the Title III Cases; and it is further ORDERED that this Order resolves Docket Entry No. 16640 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Seventeenth Omnibus Objection

Three Hundred and Seventeenth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	APONTE NAVEDO, DONATO 1364 EAGLE CREEK BLVD APT205 SHAKOPEE, MN 55379-2969	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25985	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 7/31/2017.						
2	CASTRO BADILLO, MYRKA L URBANIZACION MONTE CLARO PASEO DEL VALLE MO26 BAYAMON, PR00961	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27048	\$ 1,306.00*
Reason: Proof of Claim asserts liability on the basis of 2015 and 2016 tax refunds/returns. The records of the Department of Treasury show such refunds/returns have been fully satisfied, via direct deposits on 9/6/2016 and 5/5/2017.						
3	CORTEZ DIAZ, MARIAM HC 06 BOX 10140 GUAYNABO, PR 00971	5/21/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	32496	\$ 700.00*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19267509 on 7/10/2017.						
4	DE JESUS MORALES, ANGEL LCDO JOSE A FELICIANO URB SANTIAGO IGLESIAS 1416 AVE PAZ GRANELA SAN JUAN, PR 00921	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	41944	\$ 231,113.84
Reason: Proof of Claim and supporting documentation asserts liabilities arising from an allegedly unpaid judgment in favor of claimant. The Commonwealth's records reflect the judgment was paid in full pursuant to an established payment plan.						
5	DIAZ COSME, JOCELYN HHC 3 BOX 9431 GURABO, PR 00778	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29242	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19271201 on 7/10/2017.						
6	DIAZ RAMIREZ, LUIS RR 1 BOX 15057 MANATI, PR 00674	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	22079	\$ 1,826.00
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19233321 on 6/9/2017.						

Three Hundred and Seventeenth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	FIDEICOMISO VANNESA BAYONET DIAZ URB TORREMOLINOS H14 CALLE E GUAYNABO, PR 00969-3728	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	21896	\$ 355.00
Reason: Proof of Claim asserts liability on the basis of 2014 and 2016 tax refunds/returns. The records of the Department of Treasury show such refunds/returns has been fully satisfied pursuant to Check No. 90149946 on 3/11/2019 for 2014 and Check No. 90148372 on 1/22/2019 for 2016.						
8	FIRSTBANK PUERTO RICO MOORE AND VAN ALLEN PLLC C/O ZACHARY H SMITH 100 NORTH TRYON ST. SUITE4700 CHAROLETTE, NC 28202	5/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25387	\$ 6,853,636.90*
Reason: Proof of Claim and supporting documentation asserts liabilities arising from a term loan agreement between the Government Ethics Office and claimant. The Commonwealth's records reflect the loan with claimant was fully satisfied on December 7, 2018, and at present, the Commonwealth has no outstanding liability to claimant.						
9	GONZALEZ MARTINEZ, REINALDO 276 CALLE JILGUERO MONTEHIEDRA SAN JUAN, PR 00926	5/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	22999	\$ 26,586.00
Reason: Proof of Claim asserts liability on the basis of a 2017 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19682815 on 11/14/2018.						
10	GONZALEZ VILLANUEVA, CARLOS RR 3 BOX 9923 TOA ALTA, PR00953	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	21641	\$ 2,300.00
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 7/31/2017.						
11	HERNANDEZ GIERBOLINI, ALBERTO PARQUE MEDITERRANEO J 2 FLORENCIA GUAYNABO, PR 00966	5/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	21925	\$ 2,043.00
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19298955 on 7/31/2017.						
12	IRIZARRY COLON, JANNICEL COND ACQUALINA 186 CARR 2 APT 404 GUAYNABO, PR 00966	6/11/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23804	\$ 3,593.00
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 7/11/2017.						
13	JIMENEZ FERNANDINI, ANA URB VISTAS DE MONTE SOL 106 CALLE SATURNO YAUCO, PR 00698	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25123	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 6/1/2017.						

Three Hundred and Seventeenth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
14	LACOMBA GONZALEZ, RAFAEL URB SANTA ROSA 34-27 CALLE 26 BAYAMON, PR00957	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23729	\$ 1,500.00
Reason: Proof of Claim asserts liability on the basis of a 2017 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19298031 on 7/31/2017.						
15	LOPEZ AVILES, HECTOR M. HC 43 BOX 11888 CAYEY, PR00736-9202	6/5/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	26565	\$ 650.00
Reason: Proof of Claim asserts liability on the basis of a 2016 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 6/15/2017.						
16	MARTI LUGO, LUIS HC 7 BOX 32047 HATILLO, PR 00659	5/14/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14903	\$ 1,022.00
Reason: Proof of Claim asserts liability on the basis of a 2015 tax refund/return. The records of the Department of Treasury show 2015 tax refund was applied to prior tax debt for the year of 2013 for \$672.49 and 2014 for \$101.25. The creditor received remaining 2015 refund balance of \$248.26 pursuant to Check No. 18883228 on 8/20/2016.						
17	MENDEZ RIVERA, FRANCISCO J URB SAN FRANCISCO 1704 CALLE CRISANTEMO SAN JUAN, PR 00927-6332	5/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	26032	\$ 1,320.00
Reason: Proof of Claim asserts liability on the basis of a 2017 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 5/31/2018.						
18	MIRANDA RODRIGUEZ, JAVIER A ESTANCIAS DE LA FUENTE 10 CALLE PRADERA TOA ALTA, PR00953	5/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	19710	\$ 392.00
Reason: Proof of Claim asserts liability on the basis of a 2016 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19880120 on 4/25/2019.						
19	MONTANES VAZQUEZ, MIGUEL HC 6 BOX 10130 YABUCOA, PR 00767	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28374	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19252811 on 7/9/2017						

Three Hundred and Seventeenth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
20	OMEGA ENGINEERING, LLC OSCAR I. RIVERA PO BOX 331180 MIAMI, FL 33233	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	35979	\$ 7,020,682.11
Reason: Proof of Claim asserts liability on the basis of Contract No. 2002-142-14. The records of the Department of General Services show such liability has been fully satisfied, pursuant to agreement dated September 2018.						
21	ORTIZ MENENDEZ, HECTOR PO BOX 135 CASTANER, PR 00631	6/4/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	38595	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19283925 on 7/31/2017.						
22	PEREZ GONZALES, VANESSA CARIBE GARDENS CALLE ORQUIDEA I 12 CAGUAS, PR 00725	3/15/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	3021	\$ 1,781.22
Reason: Proof of Claim asserts liability on the basis of 2013 and 2014 tax refunds/returns. The records of the Department of Treasury show such refunds/returns has been fully satisfied pursuant to Check No. 19629415 on 8/9/2020 and Check No. 90143015 on 8/17/2020.						
23	PORTALATIN IRIZARRY, MIGUEL PO BOX 403 ANGELES, PR 00611	5/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	19167	\$ 1,145.00
Reason: Proof of Claim asserts liability on the basis of a 2015 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 90150739 on 3/29/2019.						
24	RIOS VAN DE LINDEN, TANIA 420 SAGRADO LOFTS CALLE SAN ANTONIO APTO 201 SAN JUAN, PR 00915	5/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24373	\$ 1,320.00
Reason: Proof of Claim asserts liability on the basis of a 2017 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 5/31/2018.						
25	RIVERA CANDELARIO, ERIC HC2 BOX 47053 ARECIBO, PR 00612	5/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23969	\$ 1,862.00
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied, via direct deposit on 7/13/2017.						

Three Hundred and Seventeenth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
26	RIVERA LOPEZ, MARIA VICTORIA X-47 CALLE SAN ALFONSO URB MARIOLGA CAGUAS, PR 00725	5/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18352	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refunds/returns. The records of the Department of Treasury show such refunds/returns have been fully satisfied, via direct deposits on 7/11/2016, 4/20/2017, 4/11/2018, and on 3/29/2019						
27	ROSADO ARISTUD, ALEX URB SENDEROS DE JUNCOS 20 CALLE MANDARINA JUNCOS, PR 00777	5/29/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	31543	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19254979 on 7/10/2017.						
28	RUIZ BERRIOS, CARLOS HC 12 BOX 7265 HUMACAO, PR 00791	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	26195	Undetermined*
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19259747 on 7/10/2017.						
29	VAZQUEZ, ANTONIO RR 2 BOX 7111 GUAYAMA, PR00784	4/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	6955	\$ 3,672.00
Reason: Proof of Claim asserts liability on the basis of a tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 19231478 on 6/1/2017.						
30	VILLANUEVA ROMAN, IVONNE VICTOR ROJAS 2 125 CALLE I ARECIBO, PR 00612	5/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18738	\$ 1,615.00
Reason: Proof of Claim asserts liability on the basis of a 2015 tax refund/return. The records of the Department of Treasury show such refund/return has been fully satisfied pursuant to Check No. 90138700 on 5/16/2018.						
31	XAVIER ZEQUEIRA, INC P.O. BOX 190191 SAN JUAN, PR 00919-0191	5/3/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	8954	\$ 662,166.71
Reason: The records of Oficina de Administracion y Transformacion de los Recursos Humanos del Gobierno de PR show such invoice has been fully satisfied, pursuant to Check Nos. 00217157, 00217158, 00184797, and 00322807 dated 06/15/2018, 06/15/2018, 12/21/2017, and 06/30/2020.						
						TOTAL \$ 14,822,587.78*